

April 7, 2014

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Modernizing the E-rate Program for Schools and Libraries WC Docket No. 13-184**

Dear Secretary Dortch:

The State Library of Kansas is committed to advising and assisting public library directors, staff and trustees in understanding the federal E-rate program of discounts for Internet access, telecommunications, and related eligible services and equipment.

E-rate has provided crucial financial support for connecting our libraries and communities to a wealth of internet-enabled resources and services. But to ensure our students have the edge they will need to compete in today's and tomorrow's global economy, our libraries and schools must move from basic—often inadequate connectivity—to 21st century broadband. Thus the State Library of Kansas supports the Commission's first goal of the E-rate program to focus on high-capacity and affordable broadband connectivity.

Ensuring that schools and libraries have affordable access to 21st Century broadband that supports digital learning is not as simple as taking away support for POTS and transferring that support to broadband services. There are too many variables regarding the availability of broadband services as well as concerns that VoIP services are not truly identical in features to POTS services. If support for POTS services in the form of E-rate reimbursement is to be permanently withdrawn there should be an exemption available for those schools and libraries that require it due to geographical location or safety concerns. The State Library of Kansas supports the continuation of support for voice services for those areas where there is a lack of affordable alternatives available or for those institutions where implementation of VoIP services is impractical due to safety or security concerns. Adding a requirement for applicants to certify that they fall into one of the groups covered by this exemption seems to be a reasonable way to proceed in this area.

Even with the support of our state library e-rate coordinators, program complexity is the top reason libraries choose not to participate in the program. If the commission decides to phase down or phase out support for voice services the instructions for calculating applicable discounts

would need to be very carefully explained to applicants, particularly if the Commission changes the mode of calculation to a per-user model. The State Library of Kansas believes the use of multi-year contract for recurring services may ease the administrative burden of applicants if these proposed changes do take effect.

In regard to demonstration projects the State Library of Kansas supports the use of such projects to determine appropriate avenues for exploration in the reorganization of the E-rate program. These projects would need to be chosen based upon relevancy, currency and innovativeness. Projects which duplicate the efforts of initiatives that have already been explored in BTOP or other projects should only be considered if they approach the issue of broadband connectivity in a new way or expand upon the initial project in valid and sustainable ways.

Projects which focus on bulk purchasing options or which explore ways in which current internet service providers can increase the speeds they offer community wide should be given priority. It is important to distinguish between advertised broadband speeds and actual speeds available to community members. For this reason, the State Library of Kansas supports the use of speed tracking and mapping initiatives that would help the Commission identify areas that are currently underserved although at first glance appear to have sufficient broadband available.

Opportunities to partner with local utility companies, municipal governmental agencies, and research and education networks in the provision of broadband services should also be considered in the evaluation of demonstration projects.

Due to the complexity involved in launching a demonstration project it is the position of the State Library of Kansas that the minimum length required to see any measurable results would be a period of at least two calendar years.

Our nation's libraries represent an investment in lifelong learning and Internet access for all—especially for the roughly 30 percent of Americans who lack home broadband access. The E-rate Program is the engine powering much of our work to ensure no one is excluded from digital opportunity. The State Library of Kansas and libraries across our state look forward to continue helping fulfill our nation's Universal Service goals through a future-focused and robust E-rate 2.0. Thank you for the opportunity to comment and for your consideration of our recommendations.

Sincerely,

A handwritten signature in cursive script, reading "Joanne M. Budler". The signature is written in dark ink and is positioned above the printed name and title.

Joanne M. Budler
State Librarian